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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own Motion into Addressing the Commission's Water Action Plan Objective of Setting Rates that Balance Investment, Conservation, and Affordability for the Multi-District Water Utilities of: California-American Water Company (U210W), California Water Service Company (U60W), Del Oro Water Company, Inc. (U61W), Golden State Water Company (U133W), and San Gabriel Valley Water Company (U337W).

Rulemaking 11-11-008  
(Filed November 10, 2011)

**ASSIGNED COMMISSIONER'S THIRD AMENDED  
SCOPING MEMO AND RULING ESTABLISHING PHASE II**

**Summary**

This Assigned Commissioner's ruling and third amended scoping memo (Third Amended Scoping Memo) identifies the scope and schedule for Phase II of this proceeding. In Phase II we will review the California Public Utilities Commission's (Commission's or CPUC's) water conservation rate structure, tiered rates, forecasting methods, accounting mechanisms and other standards and programs that guide water investor-owned utility (IOU) rates, charges, and cost recovery. In light of Governor Brown's Executive Order B-29-15 (Executive Order), issued on April 1, 2015, this proceeding has increased in significance. California's ongoing drought, and frequent water shortages highlight the

imperative of ensuring that our water conservation programs are effective, and that rate and recovery mechanisms are aligned with conservation incentives and supplying safe, reliable water at just and reasonable rates.

This phase of this Order Instituting Rulemaking (OIR) will evaluate the effectiveness of the Commission's water rate, forecast, charge and recovery mechanisms in achieving the statutory objective of safe, reliable water service at just and reasonable rates, and in promoting water conservation. In particular, Phase II will evaluate current policies and potential improvements in policies related to: (1) rate structures, including conservation rate design, tiered rates, and other rate-design issues including forecast mechanisms especially in light of the recently issued Executive Order; (2) accounting mechanisms such as the Water Revenue Adjustment Mechanisms (WRAMs) and Modified Cost Balancing Account (MCBAs); and (3) in collaboration with the State Water Resources Control Board and the Department of Water Resources the role and use of data<sup>1</sup> and technology to assist in smart conservation among different sectors in the State of California.

## **1. Background**

The Commission opened this OIR to address the policy objective of setting rates for multi-district water utilities that balance investment, conservation, and affordability.<sup>2</sup> Decision (D.) 14-10-047 resolved and closed Phase I of this

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<sup>1</sup> Executive Order B-29-15, #9

<sup>2</sup> This is one of the six policy objectives identified in the Commission's Water Action Plans. The other five objectives are to: (1) maintain highest standards of water quality; (2) strengthen water conservation programs to a level comparable to those of energy utilities; (3) promote water infrastructure investment; (4) assist low income ratepayers; and (5) streamline CPUC regulatory decision-making. See 2005 Water Action Plan at 4; 2010 Water Action Plan at 4.

rulemaking proceeding after finding that no single solution should be adopted to mitigate all high-cost and affordability problems found to exist within one or more districts of multi-district water utilities. D.14-10-047 directed that a Phase II of this proceeding be opened to analyze and propose actions on issues regarding affordability and rate design, including but not limited to conservation rate design such as tiered rate structures, and accounting mechanisms such as WRAMs and MCBAs. In addition, D.14-10-047 directed each multi-district water utility to perform a district-based rate review, report on the review in its next general rate case (GRC) application or in Tier 3 GRC advice letters (ALs), as applicable, and propose one or more appropriate rate balancing solutions to mitigate any high-cost and affordability problems.

As a result of the recent Executive Order and in consideration of the current drought, Phase II will necessarily consider ideas to promote smart conservation above and beyond traditional accounting mechanisms.

## **2. Discussion**

Comments in Phase I of this proceeding raised several issues regarding affordability and rates that were not contemplated in the original scope but which are fundamentally related to balanced rates. Therefore, it is appropriate for the Commission to address these issues in Phase II, especially in light of Governor Brown's January 2014 and April 2015 drought declarations. The mandatory water restrictions and higher rates for large water users imposed by the most recent Executive Order and CPUC action regarding this Executive Order make it imperative that we examine these issues to achieve conservation goals and ensure safe and reliable water delivery, consistent with just and reasonable rates. This Phase will analyze issues and propose actions regarding affordability and rate design, including but not limited to, conservation rate

design such as tiered rate structures, technical enhancements, forecast methods, and accounting mechanisms such as Water Revenue Adjustment Mechanisms.

## **2.1 Tiered Rates and Conservation**

The Commission set a new direction in rate structure for water utilities in 2010 based on the principles and objectives of the Water Action Plan (WAP). In particular, D.10-04-031 (the San Gabriel Rate Design Decision)<sup>3</sup> adopted two rate design principles that have since been used by the Commission in water ratesetting proceedings. First, a high proportion of total annual revenues – at least 70 percent – are to be derived from quantity charges, that is, charges based on the amount of water received, with only a small portion – less than 30-percent – collected through fixed charges, sometimes called “service charges.” The basic principle underlying the 70-percent rule is stated in the Best Management Practices (BMPs) of the California Urban Water Conservation Council (CUWCC).<sup>4</sup>

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<sup>3</sup> D.10-04-031, “Decision Authorizing Changes in Rate Design and Ratesetting Mechanism, and Denying Motion for Establishment of a Memorandum Account,” Application (A.) 08-09-008, April 8, 2010.

<sup>4</sup> Memorandum of Understanding Regarding Urban Water Conservation in California, California Urban Water Conservation Council, originally adopted in September, 1991, and updated most recently, September 14, 2011. The most recent version is available on the website at: <http://www.cuwcc.org/>. Specifically, see section 1.4, “Retail Conservation Pricing,” page 29 and following. On page 30, the MOU offers two options for determining whether the volumetric rate is “sufficiently consistent with the definition of conservation pricing,” i.e., high enough. Option 1 is to “Let V stand for the total annual revenue from the volumetric rate(s) and M stand for total annual revenue from customer meter/service (fixed) charges, then:

$$\frac{V}{V + M} \geq 70\%$$

The document does not reveal the provenance of the 70-percent number itself or why 60-percent would be inadequate or 80-percent would be more than sufficient. The second option is not a

*Footnote continued on next page*

Second, residential rates are to include tiers, sometimes called “inclining blocks,” with a low rate for the first amount of household consumption, up to the median household level of consumption, followed by a higher rate for consumption beyond the median level. In D.10-04-031, the higher-tier rate was set at 15 percent above the first-tier rate. The April 2015 Court of Appeal decision in *Capistrano Taxpayers Association, Inc. v. City of San Juan Capistrano*<sup>5</sup> that applies only to municipal water providers held that tiered rates must be tied to evidence of cost of service. This decision does not apply to water IOUs regulated by the CPUC. We seek comment below on the impact of this decision on IOUs, including on their wholesale water suppliers.

## **2.2 Accounting Mechanisms: WRAM and MCBA**

The Commission adopted the policy that accounting measures should be employed to decouple water sales from the utilities’ revenues, as the Commission has done in the regulation of energy utilities.<sup>6</sup> First, decoupling is a tool intended to remove any disincentive to conservation on the part of the utility. Second, the Commission concluded that conservation rates could result in financial instability of the utility, if not properly calibrated to recover reasonable costs. This task was accomplished through risk reduction accounting mechanisms.

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binding test for California water utilities and does not contain a specific percentage requirement. The CPUC’s adoption of a 70-percent target for volumetric charges is based on the equation shown above for Option 1.

<sup>5</sup> *CAPISTRANO TAXPAYERS ASSOCIATION, INC. v. CITY OF SAN JUAN CAPISTRANO*, 2015 Cal. App. LEXIS 330 (April 20, 2015).

<sup>6</sup> See, D.08-02-036, D 08-08-030.

Risk-reduction accounting mechanisms were created to provide the opportunity for utility recovery of revenues when variable component costs change over time.<sup>7</sup> Variable component costs of an investor-owned water utility include purchased water, purchased power, and pump tax expenses. This was done in several ways.

First, the creation of an Incremental Cost Balancing Account (ICBA) allows water utilities to track changes in actual variable component prices, up or down, against the estimates authorized by the Commission in the GRC. The ICBA tracked changes between estimated and actual prices for the variable components.

Second, the WRAM gives the utilities an opportunity to earn a recovery of authorized revenues through quantity rates. The purpose of the WRAM is to decouple the utility's recovery of revenue from the utility's retail water sales while promoting water conservation.<sup>8</sup> Under the current rate recovery mechanism for investor-owned water utilities, 70% of the revenues authorized to be recovered in the GRC are recovered through variable rates.

The MCBA mechanism supplanted the ICBA as a risk management accounting tool. Enacted in conjunction with the WRAM, the MCBA tracks changes in actual variable component costs against those estimated in the general rate case when the price of the variable component changed *or* there is a change in the quantity of the variable component used.

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<sup>7</sup> See, D. 08-02-036, D.08-08-030.

<sup>8</sup> See, D.08-02-036, D. 08-08-030, D.08-09-026, D.09-05-005, D.12-04-048.

For example, under WRAM/MCBA, if actual sales are lower than estimated in the GRC, then the utility collects less revenue than authorized by the Commission. This under-collection in revenue is tracked in the WRAM. Lower actual sales may indicate that the utility experienced lower variable costs (less water purchased, less power used) resulting in the need to collect less revenue than estimated in the GRC. The potential under-collection in variable costs is accounted for in the MCBA. Conversely, increases in the commodity costs of water, including the energy costs in pumping or transporting water, may result in higher costs than estimated in the GRC, while conservation leads to lower water consumption and less cost recovery through variable rates.

Generally, the MCBA acts to offset WRAM balances arising from reduced sales from what was estimated when rates were set in the GRC. On an annual basis, utilities with a WRAM/MCBA mechanism file an AL to recover the net over – or under-collection in the previous year’s WRAM/MCBA balance through either a surcredit or surcharge on customer bills.

The Commission determined that to both promote water conservation and to reduce any financial instability resulting from the adoption of conservation rates, the Class A water utilities should be permitted to apply for WRAMs to deal with unanticipated revenue gains or losses resulting from divergences between forecasts of water consumption and actual consumption, and MCBAs to address unanticipated changes in the cost of water procured. The Commission expected utilities to track the balances in the WRAMs and MCBAs and request surcharge/surcredit adjustments in each rate proceeding or annually, if necessary, with the goal of keeping the balances small and trending toward zero.

The Commission’s Division of Water and Audits (DWA) analyzed the progress of the WRAM and MCBA over/under collections from 2010 through



2012, the most recent year for which complete data are available. The under-collections of the utilities, i.e., the balances that must be collected in future rates, have been large and persistent. That is, customers have generally been consuming less water than was forecast in water ratesetting decisions. As a result, the revenues collected in rates have been less than was forecast, and not only by the percentage of departure from the forecast, but by much more than that percentage. The larger deviation occurred because under tiered conservation rates the reduced consumption mostly occurred in the higher tiers. Unless the WRAM and rate mechanisms are adjusted, it is anticipated that in future GRCs the utilities will file for higher rates to make up for these losses, and may still run large WRAM balances if conservation exceeds forecasts. The fact that WRAM balances are large and persistent indicates that the existing regulatory remedies will not reduce or eliminate the balances. These trends raise questions about whether the current rate and accounting mechanisms are well-calibrated to achieve our statutory objectives of safe, reliable service at just and reasonable rates, and to incentivize water conservation, a growing imperative in California's drought. In light of the drought and the Governor's Executive Order to address the drought emergency, accounting mechanisms may not be enough to incentivize conservation and ensure safe, reliable service at just and reasonable rates, and additional creative solutions may be necessary.

### **2.3 Specific Concerns Regarding Policies on Conservation Rates and Accounting Mechanisms**

In order to further our goals of conserving California's water in economically optimal, efficient and equitable ways, it is necessary to evaluate whether our rate structures and mechanisms, conservation rates, and accounting methods are achieving the Commission's statutory mission. Phase II will review



whether it is prudent or reasonable to create standardized or revised tiered rates, better accounting methods, and consider new types of solutions. Conservation rates are supposed to provide a strong signal to customers that reducing water consumption will result in lower bills.<sup>9</sup> That signal is muted through a variety of factors including delayed access to consumption information, and the pricing, accounting, forecasting, and other structures.

Specific issues concerning conservation rates include the following:

### **2.3.1 Marginal Prices vs. Average Prices.**

Conservation rates – specifically, tiered rates – are believed to provide a clear and consistent signal to customers regarding the high cost of developing (or acquiring) and delivering safe and reliable water from new sources. This rate design is rooted in the theory that high marginal prices, such as are provided to customers in the higher tiers, provide a stronger signal to customers than do lower marginal prices. This theory has been challenged in the economic literature, at least regarding consumption of electric service. For example, a recent article found strong evidence that consumers respond to average price rather than marginal or expected marginal price, concluding that nonlinear pricing (such as tiered rates that impose higher prices for the next marginal quantity of water) may not be the best tool to achieve conservation goals.<sup>10</sup>

The tiered rates of the Class-A water utilities have been adopted in decisions on GRCs, generally resulting from settlements between the applicants

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<sup>9</sup> This is particularly challenging when companies have very large fixed costs.

<sup>10</sup> Koichiro Ito, “Do Consumers Respond to Marginal or Average Price? Evidence from Nonlinear Electricity Pricing,” *American Economic Review* 2014, 104(2): pp 537-563.

and intervening parties. There are differences among the utilities in the structure of the baseline quantities associated with the break points between the tiers, in the ratios of the rates in the tiers, and in the number of tiers. Now, with several years of experience with the individual utilities' rates, it is time to review the effect of those rates and mechanisms.

At the Commission's May 1, 2014 meeting in Los Angeles, a board member of the Moulton Niguel Water District, a publicly-owned utility, suggested that large balances in WRAMs could be avoided if rates were set to meet a budget within the low tiers, and revenue from the higher tiers could be used to fund conservation programs, education, outreach, and staffing to analyze agency water use efficiency and target funding to maximize effectiveness. The speaker also suggested that rates from higher tiers could be used to construct water reliability projects. The District provided a one-page summary of the proposed program, included as Attachment 1 to this Third Amended Scoping Memo.

Conservation rates are designed to underscore the effects of conservation or lack thereof, with the general intent of reducing consumption, while promoting the optimal use of water consistent with availability, cost, customer needs and customer desires. As discussed above, currently implemented conservation rate design principles limit the amount of revenue to be recovered through a fixed customer charge. Under conservation rate designs, most revenues are collected from the volume of water consumed, and increasing block rates provide incentives to reduce consumption of water. Conservation rate designs are not based on the cost structure of providing water service because most costs are fixed and these costs do not decline measurably in response to changes in quantities of water customers consume. This approach is consistent with the 2011 CUWCC best practices discussed above.

Under the current conservation rate design, any difference between consumption forecasts and actual sales is exaggerated in the financial effects both to the utilities and to their customers. Conservation rates alone do not provide a utility with an incentive to be neutral or to encourage customers to conserve water. Without some countervailing measure, conservation rates would provide strong incentives to utilities not to encourage conservation because reduced consumption means reduced revenues. Decoupling revenues from sales through the use of WRAMs and MCBAAs removes that disincentive to conservation and reduces revenue volatility while allowing tiered rates to reflect the marginal cost of new water.

### ***2.3.2 Customer Impacts***

There are two issues associated with collecting WRAM and MCBA balances. The first is associated with the customer's frustration with the WRAM balance bill that may rise as a result of conservation. This leads many customers to puzzled exasperation "We did what you asked, we conserved, yet we have to pay more." It is an unfortunate fact that even without overhanging WRAM balances, lower consumption combined with unchanging or even escalating fixed and variable costs necessarily means that future rates may need to be higher. Attempting to reduce outstanding balances over a smaller quantity base, compounds the degree to which rates may be raised. This may affect rates for all tiers, not just the higher tiers, resulting in pressure for increased rates, even for customers who conserve water and consume primarily in the lower tiers.

The second issue is that carrying a large balance into the future for later collection has the effect of separating the consumers who incurred the costs from the consumers who must pay the costs. This is known as the "inter-generational transfer" argument. Arguably, each group of customers should pay its own

costs, and contemporaneous collection of costs is the best way to avoid an inter-generational transfer. The build-up of large and persistent balances in the WRAM and MCBA accounts compounds the inter-generational transfer issue. Moreover, efforts to reduce high WRAM balances in a reasonable time period can result in rate shock.

Some parties argue that the WRAM/MBCA policy is not intended to generally decouple revenues from sales but instead decouple only the changes in sales resulting from conservation rates. Proponents of this view argue that rate and accounting mechanisms should not insure against natural events such as the effects of drought on conservation, but only against the effects of conservation rates on consumption.

WRAM balances have been collected through surcharges on quantity sales. This proceeding will consider whether other forms of surcharge may be more efficient or equitable. Such other methods could include, but may not be limited to, a minimum quantity charge or a fixed surcharge that does not vary with quantity consumed.

### **3. Phase II Scoping Memo**

Pursuant to D.14-10-047 the Commission is opening Phase II of this proceeding. Parties are requested to provide comments on the following issues. We encourage bold, creative ideas, including radical departures from our current way of doing business. Toward that end, the Commission wishes to better understand the effects of our current policies regarding tiered rates, conservation rates, forecasting, data and technology, metering and billing, accounting mechanisms and other programs and how to improve these policies and mechanisms. Specifically, we will consider the following issues:

1. Do tiered, inclining block rates provide a clear, appropriate, and timely signal to residential customers regarding conservation of water? Are there adjustments to existing policies or better rate policies or mechanisms that should also be considered now in light of the drought and recent Executive Order?
2. If tiered inclining block rates are appropriate, should the Commission adopt standards regarding tiered rates? In particular, should the Commission adopt a specific policy regarding the formation of baseline quantities associated with the break points between the tiers? Should household circumstances such as the number of residents and the size of the property be considered when setting baseline and other quantities? Should there be standards regarding the ratios of the rates in the tiers and or in the number of tiers. Does the drought and Executive Order change thinking and inspire new options?
3. Should the Commission consider modifying the 70-percent rule adopted from CUWCC so that a higher or lower percentage of revenue would be collected through quantity charges? Should technological innovation be somehow tied to the consideration? Does the drought and Executive Order require a new way of thinking about revenue?
4. The Governor's April 1, 2015 Executive Order on the drought requires in paragraph 17 that the California Energy Commission (CEC) and the Department of Water Resources (Water Resources) implement a Water Energy Technology program to deploy innovative technologies for businesses, residents, industries, and agriculture. The Executive Order suggests use of advanced technologies such as water use monitoring, irrigation timing, and precision water management and use technologies. The CPUC is coordinating with CEC, Water Resources, sister agencies, and the Water Energy Team of the Climate Action Team to implement the Executive Order including paragraph 17. What changes

are merited to the CPUC's tiered rate structures, accounting mechanisms, forecasting rules, technology enhancements or monitoring and billing systems including metering to achieve the CPUC's statutory objectives of ensuring that utilities provide safe, reliable service at just and reasonable rates while promoting conservation of water and addressing the drought emergency and Governor's Executive Orders?

5. Should the Commission consider a tiered inclining block pricing structure that would be designed to recover the full revenue requirement of utilities within the revenue collected from the lower tiers, with the revenues from the highest tier designated for the purpose of recovering the balances in the WRAMs and the MCBAs and/or to fund conservation programs or provide rebates to customers? Address the legal and factual issues raised by such a structure. Is such a structure well-calibrated to achieve conservation, just and reasonable rates, and safe and reliable water service?
6. What rate structure and accounting mechanisms are best suited to offer safe, reliable water service at just and reasonable rates, provide incentives to conserve, and provide sufficient revenue for water system operation and investment needs? Are there other mechanisms that should be taken into account now in light of the drought and Executive Order?
7. Do WRAMs and MCBAs, by decoupling the utilities' revenue functions from changes in sales, succeed in neutralizing the utilities' incentive to increase sales? Is there a better way?
8. Are WRAMs and MCBAs effective mechanism to collect authorized revenue in light of tiered inclining block conservation rates? Is there a better way to proceed in light of the drought and the Executive Order?
9. Do WRAMs and MCBAs appropriately incentivize consumer conservation? Are adjustments needed?

Would another mechanism be better suited for the utility to collect authorized revenue for water system needs and encourage conservation in light of the drought and the Executive Order?

10. Are WRAMs and MCBAs effective at encouraging conservation when decreases in volumetric consumption by some or all consumers lead to large balances in WRAMs and MCBAs being assessed on all ratepayers? What adjustments in the WRAM or MCBA mechanisms are needed to encourage conservation? Should such adjustments be paired with other steps such as advanced metering, other technology, and/or steps to more quickly detect leaks and notify customers about water usage?
11. Do WRAMs and MCBAs achieve the statutory objective of safe, reliable water service at just and reasonable rates? Is their function properly communicated to consumers and do consumers understand their purpose?
12. What changes, if any, should be made to the Revised Rate Case Plan adopted by D.07-05-062 or other Commission policies adopted to reduce the balances in WRAMs and MCBAs and reduce the degree of inter-generational transfers and/or rate shock? Would faster WRAM and MCBA collection be consistent with just and reasonable rates and be transparent to consumers?
13. Is there a policy or procedure that would accomplish the same results as the WRAM and MCBAs without the attendant issues discussed in the previous questions especially in light of the drought and the Executive Order?
14. Should the WRAM and MCBAs account for changes in sales generally, or should its effect be limited to changes in sales induced by the CPUC and other government agents? Is there another way?



15. Should WRAM and MCBA balances continue to be collected through surcharges on quantity sales? Would other forms of surcharge be more efficient or equitable, or better accomplish safe, reliable service, at just and reasonable rates and incentivize conservation? Such other methods could include, but are not limited to, a minimum quantity charge, a minimum bill, or a fixed surcharge that does not vary with quantity consumed.
16. Please make any other comments or recommendations that promote achieving the objectives of Phase II.

#### **4. Categorization**

Consistent with the preliminary categorization in the original OIR (which was not changed by the Commission in D.14-10-047), Phase II of this proceeding is quasi-legislative as defined in Rule 1.3(d). We anticipate that the issues in this proceeding may be resolved through comments without the need for evidentiary hearings. This phase of the proceeding will consider and may establish policies for Class A and Class B water utility rate and accounting mechanisms. The application of policies adopted in this proceeding to any particular water utility will be considered through a separate phase or through separate proceedings such as GRCs.

#### **5. Initial Schedule**

Opening comments: May 21, 2015

Reply comments: June 9, 2015

I anticipate that the assigned Administrative Law Judge (ALJ) may convene a prehearing conference (PHC) or workshops to more fully develop the questions and consider proposals or other questions that may be addressed in the Opening and Reply Comments.

I anticipate that either I or the assigned ALJ may issue a ruling with a more detailed schedule upon receipt of the opening and reply comments and after consideration of the insights gleaned at any PHC and/or workshops that may be held.

Consistent with Pub. Util. Code § 1701.5, I anticipate this proceeding will be concluded within 18 months of the issuance of this Third Amended (Phase II) Scoping Memo, with a goal to conclude this proceeding with 12 months. Resolutions may be submitted to the Commission in advance of the Proposed Decision to address urgent issues in light of the drought and the Governor's Executive Orders on water conservation.

This Third Amended Scoping Memo and Ruling establishing Phase II of the OIR means that a final decision in this rulemaking likely cannot be reached by April 30, 2015, the date by which this proceeding is now scheduled to be closed. (D.15-02-034.) Pub. Util. Code § 1701.5 requires the Commission to resolve a quasi-legislative proceeding, such as this rulemaking, within 18 months of the date of the scoping memo, or to extend the statutory timeline. I find that an extension is necessary given the opening of this second phase of the proceeding and the complexity of the matters at issue at this present time of drought. Therefore, good cause appearing, I will authorize an 18-month incremental extension to the statutory deadline, to October 30, 2016.

#### **6. Becoming a Party; Joining and Using the Service List; Enrolling in Subscription Service**

The existing service list will continue be used for Phase II, as discussed more below. The existing service list can be viewed on the Commission's web page for this proceeding.

**Respondents:** The OIR named California-American Water Company, California Water Service Company, Del Oro Water Company, Inc., Golden State Water Company, and San Gabriel Valley Water Company as respondents to this rulemaking.

**New Respondents:** In addition to the five companies now named respondents, the remaining water companies in Class A and Class B will be named respondents and added to the “Parties” category of the service list. The new respondents are included in the full list of Class A and Class B water utilities identified in Attachment 2.

**Other Parties:** Persons who are not already on the service list for this proceeding may request party status by filing a written motion or by making an oral motion at a prehearing conference if one is held (see Rule 1.4(a)(3) and (4)). Only one representative per party will be listed in the “Parties” category. Additional representatives will be added as “Information Only.”

**Information Only:** Persons now in the “Information Only” category will remain in that category. A person seeking to be included to that category will be added to the “Information Only” category of the official service list upon request to the Process Office. Persons must provide an e-mail address in order to receive service of documents that are not required to be served by hard copy. (See Rule 1.10(b).) Persons may request the ALJ to require additional service as appropriate.

**State Service:** A member or employee of the Commission, State Legislature or other State office or agency not already on the existing service list will be added to the “State Service” category of the official service list upon request to the Process Office. Any such person who declines to provide an

e-mail address will receive hard-copy service of all documents.

(See Rule 1.10(b).)

**Act Now to Receive Opening Comments:** Persons not now on the service list who wish to receive service of the opening comments, and who intend to become parties, should immediately file a motion for party status. Other persons not now on the service list who wish to receive service of opening comments should immediately contact the Process Office to request addition in the appropriate category.

**Send your request to the Process Office:** You may use e-mail ([process\\_office@cpuc.ca.gov](mailto:process_office@cpuc.ca.gov)) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Include the following information:

- Docket Number of this rulemaking;
- Name (and person or entity represented, if applicable);
- Postal Address;
- Telephone Number;
- E-mail Address; and
- Whether you request “State Service” or “Information Only.”

It is the responsibility of each person or entity on the official service list in any category to ensure that its designated person for service, mailing address and/or e-mail address shown on the official service list are current and accurate.

**Subscription Service:** You can also monitor the rulemaking by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission’s website. There is no need to be on the service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission’s website at <http://subscribecpuc.cpuc.ca.gov/>

## **7. Serving and Filing Documents**

Filing and service of comments and reply comments is governed by Article 1 of the Rules of Practice and Procedure. The Commission encourages electronic filing and e-mail service. You may find information about electronic filing at <http://www.cpuc.ca.gov/PUC/efiling>. E-mail service is governed by Rule 1.10. If you have questions about the Commission's filing and service procedures, contact the Docket Office ([docket\\_office@cpuc.ca.gov](mailto:docket_office@cpuc.ca.gov)).

## **8. Intervenor Compensation**

Existing notices of intent (NOI) to claim intervenor compensation were based on the original OIR, and did not contemplate Phase II. Therefore, existing NOIs must be amended to recognize Phase II. A new party that expects to claim intervenor compensation for its participation in Phase II of this rulemaking must file its NOI to claim intervenor compensation for Phase II. In each case, the amended NOI or the NOI for a new intervenor must be filed within 30 days of the filing of reply comments to this Third Amended Scoping Memo, except that notice may be filed within 30 days of a prehearing conference in the event that one is held. (See Rule 17.1(a)(2).)

## **9. Public Advisor**

Anyone interested in participating in this rulemaking who is unfamiliar with the Commission's procedures should contact the Commission's Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov) or in Los Angeles at (213) 576-7055 or (866) 849-8391, or e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov). The TTY number is (866) 836-7825.

## **10. *Ex Parte* Communications**

Pursuant to Rule 8.2(a), *ex parte* communications in this rulemaking are allowed without restriction or reporting requirement.

### **IT IS RULED that:**

1. Phase II of this rulemaking is initiated to evaluate the effectiveness of the Commission's water conservation rate structure, tiered rates, forecasting methodologies, or accounting mechanisms, and whether they should be adjusted to achieve the statutory objective of safe, reliable water service at just and reasonable rates, and to promote water conservation.
2. Phase II of this rulemaking is initiated during a time of drought in the State of California and an Executive Order issued requiring significant reductions in water usage. We must consider new accounting and technical mechanisms including new technologies to reduce water use.
3. All Class-A and Class-B jurisdictional water utilities are made respondents to Phase II of this proceeding, and those not currently on the service list are added to the party category.
4. This Third Amended Scoping Memo will be served on (a) the service list of this proceeding (the Balanced Rates OIR (R).11-11-008), and (b) the service list for the current (and if no current, then the most recent prior) general rate case of each respondent utility (see Attachments 3 and 4).
5. Respondents shall file comments responsive to the scope of issues and questions raised in Section 3 of this Third Amended Scoping Memo, and other parties are invited to file comments. Opening comments must be filed no later than May 21, 2015, and reply comments no later than June 9, 2015.
6. The category of Phase II of this rulemaking continues to be "quasi-legislative," and it is determined that no hearings are necessary.

7. The assigned Commissioner and/or Administrative Law Judge (ALJ) may make additions or adjustments to the schedule and official service list for this proceeding, as appropriate. The assigned Commissioner and/or assigned ALJ may set a prehearing conference or workshop if it is determined that one should be held.

8. Any Party that expects to request intervenor compensation for its participation in this rulemaking shall file an amended or new notice of intent to claim intervenor compensation, in accordance with Rule 17.1 of the Commission's Rules of Practice and Procedure, within 30 days of the date of the filing of reply comments, or 30 days of the date of a prehearing conference (if held) as specified in Section 8.

9. Catherine J.K. Sandoval is the Assigned Commissioner and Gary Weatherford is the Assigned ALJ.

Dated April 30, 2015, at San Francisco, California.

/s/ CATHERINE J.K. SANDOVAL  
Catherine J.K. Sandoval  
Assigned Commissioner



# ATTACHMENT 1

## **ATTACHMENT 1 -- Explanation of Moulton Niguel Water District Program**

### **Water Budget Based Rate Structures or Allocation Based Rates Explained**

As part of our long-term water conservation and supply reliability strategy, on July 1, 2011, the District implemented water budget based (also referred to as allocation-based) rates. A water budget based rate structure is a form of inclining block rate structure where a budget is allocated amongst the first blocks or tiers and is based on the estimated, efficient water needs of individual customers. Moulton Niguel Water District's water budget based rate structure creates a pricing incentive to stay within the individually determined water budget with relatively high rates steadily increasing into the upper tiers.

The indoor water budget is determined by allotting an indoor usage per person (65 for MNWD) per day, multiplying by the number of days in the billing cycle and the number of people in the household. Originally, customers are assumed to have four people in the household for single family residential and two people for multi-family housing. If a customer has a different household size, they can file a variance to adjust the number of people used to calculate their indoor water budget.

Calculation of Indoor Allocation = (Household Size) x (65 GPCD) x (Conversion Factor) x (Days Billed)

The outdoor water budget is determined from irrigation area and measured evapotranspiration by microclimate.

Calculation of Outdoor Allocation = (ET<sub>o</sub>) x (Irrigation Area) x (Conversion Factor) x (Crop Coefficient)

The District used a combination of geospatial analysis and in-person site visits to estimate the irrigable area for each meter. The crop coefficient used is for turf grass or 0.8. For commercial meters without a dedicated irrigation meter, it is difficult to estimate an exact budget because of differing water usage needs by industry. The District uses a 3-year average of each month to determine the total water budget. The first 20 ccf of commercial customers is in the first tier.

Currently, the District is funding a meter replacement program to switch commercial customers without a dedicated irrigation meter to install one. For all customers, usage above the efficient allotment results in payment of the higher rates, increasing to over \$11 in tier 5. The revenue derived from the tiers 4 and 5 above the tier 2 rate is used to fund conservation programs, education, outreach,

and staffing to analyze agency water use efficiency and target funding to maximize effectiveness. In addition, the penalty revenue can be used to construct water reliability projects.

<b>Table 1</b> <b>Water Budget Based Rate Structure July 2011 to Present</b>		
<b>Tier</b>	<b>Allocation</b>	<b>Rate (per ccf)</b>
<b>1</b>	Indoor Water Budget	\$1.38
<b>2</b>	Outdoor Water Budget	\$1.54
<b>3</b>	100 to 125% of Water Budget	\$2.75
<b>4</b>	126 to 150% of Water Budget	\$5.51
<b>5</b>	Above 151% of Water Budget	\$11.02

(END OF ATTACHMENT 1)

# **ATTACHMENT 2**

**ATTACHMENT 2 - RESPONDENTS**

**CLASS-A**

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**CLASS-B**

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**(END OF ATTACHMENT 2)**



# **ATTACHMENT 3**

**ATTACHMENT 3**

**THIRD AMENDED SCOPING MEMO  
SERVED ON THE FOLLOWING SERVICE LISTS  
OF MOST RECENT (OR MOST RECENT PRIOR)  
GENERAL RATE CASE**

LINE NO	UTILITY	GRC APPLICATION NO
1	Apple Valley	A.14-01-002
2	California Water	A.12-07-007
3	California American	A.13-07-002
4	Golden State	A.14-07-006
5	Great Oaks	A.12-07-005
6	Park Water	A.15-01-001
7	San Gabriel Valley – Fontana	A.11-07-005
8	San Gabriel Valley – Los Angeles	A.10-07-019
9	San Jose	A.15-01-002
10	Suburban	A.14-02-004
11	Alisal (Alco)	A.10-02-006

**(END OF ATTACHMENT 3)**

# **ATTACHMENT 4**

ALCO WATER SERVICE  
SALINAS DISTRICT  
ADVICE LETTER NO. 160  
SERVICE LIST  
(AS PER SECTION 7.2 OF GENERAL ORDER NO. 96-B)

Bruce DeBerry  
Division of Water and Audits  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
[water\\_division@cpuc.ca.gov](mailto:water_division@cpuc.ca.gov)

California Water Service Company  
254 Commission Street  
Salinas, CA 93901-3737

Danilo E. Sanchez  
Manager, Water Branch  
Division of Ratepayer Advocates  
505 Van Ness Avenue  
San Francisco, CA 94102

County Clerk  
County Administrative Office  
168 West Alisal Street, 1st Floor  
Salinas, CA 93901

City Manager  
City of Salinas  
200 Lincoln Avenue  
Salinas, CA 93901

**BAKMAN WATER COMPANY  
SERVICE LIST**

**Parties**

---

Richard Tim Bakman  
President  
Bakman Water Company  
P.O. Box 7965  
Fresno, California 93747  
For: Bakman Water Company

**Information Only**

---

Mr. Henry McLaughlin  
Management Analyst III  
City of Fresno  
Water Division  
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Fresno, California 93703-2927

County of Fresno  
Public Works and Planning Department  
2220 Tulare Street  
6<sup>th</sup> Floor  
Fresno, California 93721-2102

**State Service**

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Mr. Raminder Kahlon  
California Public Utilities Commission  
Division of Water and Audits  
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505 Van Ness Avenue  
San Francisco, California 94102-3214

Mr. James Boothe  
California Public Utilities Commission  
Division of Water and Audits  
Fourth Floor  
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Mr. Bruce DeBerry  
California Public Utilities Commission  
Water and Sewer Advisory Branch  
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**East Pasadena Water Company**  
Advice Letter No. 85  
Service List

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Pasadena Water & Power  
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Pasadena, CA 91101

Tom Tait  
City of Arcadia Water Department  
240 West Huntington Drive  
Arcadia, CA 91006

Ken Tcheng  
Sunnyslope Water Company  
1040 El Campo Drive  
Pasadena, CA 91109

Department of Ratepayer Advocate  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Public Advisor's Office  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2103  
San Francisco, CA 94102

Mr. Daniel Song  
California Public Utilities Commission  
Water Division  
505 Van Ness Avenue  
San Francisco, CA 94102

FRUITRIDGE VISTA WATER COMPANY  
ADVICE LETTER NO. 105-A  
SERVICE LIST

Anna A.  
4200 43rd Ave.  
Sacramento, CA 95824

Jose R.  
6141 37th St.  
Sacramento, CA 95824

Jeannette Lopez  
6220 41st St.  
Sacramento, CA 95824

Avwa Valdez  
4116 43rd Ave.  
Sacramento, CA 95824

Julie Heinz  
3711 43rd Ave.  
Sacramento, CA 95824

John B.  
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Sacramento, CA 95824

Benjamin Castillo  
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Linda C.  
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Sacramento, CA 95824

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Sacramento, CA 95824

Hao Nguyen  
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Elk Grove, CA 95624

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Sacramento, CA 95824

Tyrone X.  
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Jose L. A.  
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James Woolsey  
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Sacramento, CA 95831

California American Water  
4701 Beloit Drive  
Sacramento, CA 95838

Janell S.  
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Sacramento, CA 95824

Robert C. Cook, Jr.  
Fruitridge Vista Water Co.  
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Sacramento, CA 95814

Sacramento County Water Agency  
3847 Branch Center Road, Trailer #5  
Sacramento, CA 95827

California Dept. of Health  
Division of Drinking Water & Environmental Mgmt.  
Attn: Section Chief, Drinking Water Infrastructure Financing Section  
1616 Capitol Mall, MS 7418  
Post Office Box 997377  
Sacramento, CA 95899-7377

Jessica Hess  
Department of Utilities  
City of Sacramento  
1396 35th Avenue  
Sacramento, CA 95822



**Del Oro Water Company  
Country Estates District**

**Service List for Advice Letter No. 338-B**

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**Del Oro Water Company  
Magalia District**

**Service List for Advice Letter No. 407**

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**Del Oro Water Company  
Tulare District  
Service List for Advice Letter No. 404**

**California Public Utilities Commission**

Division of Ratepayer Advocates

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**California Public Utilities Commission**

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**Del Oro Water Company  
Johnson Park District**

**Service List for Advice Letter No. 385**

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**Del Oro Water Company  
Strawberry District  
Service List for Advice Letter No. 406**

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**Del Oro Water Company  
Stirling Bluffs District**

**Service List for Advice Letter No. 402**

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**Del Oro Water Company  
Metropolitan District  
Service List for Advice Letter No. 379**

**California Public Utilities Commission**

Division of Ratepayer Advocates

[dra\\_water\\_al@cpuc.ca.gov](mailto:dra_water_al@cpuc.ca.gov)

**Tulare County Administrator**

Jean Rousseau

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**Springville Public Utility District (SPUD)**

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**McFarland Mutual Water Company**

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**California Public Utilities Commission**

Daniel Song

Division of Water and Audits

415-703-2691

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**Del Oro Water Company  
California Pines District**

**Service List for Advice Letter No. 405**

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---	--



**Del Oro Water Company  
Arbuckle District**

**Service List for Advice Letter No. 400**

<p><b>California Public Utilities Commission</b> Division of Ratepayer Advocates <a href="mailto:dra_water_al@cpuc.ca.gov">dra_water_al@cpuc.ca.gov</a></p> <p><b>Del Oro Water Company</b> Janice Hanna, Director of Corporate Accounting <a href="mailto:jeh@corporatecenter.us">jeh@corporatecenter.us</a></p> <p>Stephanie Sprague, Staff Accountant <a href="mailto:stephanie@corporatecenter.us">stephanie@corporatecenter.us</a></p> <p>Tara Campbell, Staff Accountant <a href="mailto:tlc@corporatecenter.us">tlc@corporatecenter.us</a></p> <p>Cheryl Carter, Accounts Receivable <a href="mailto:cmc@corporatecenter.us">cmc@corporatecenter.us</a></p> <p><b>Del Oro Water Company, Inc.</b> <a href="mailto:servicelist@delorowater.com">servicelist@delorowater.com</a></p>	<p><b>Kathleen Moran, Colusa County Clerk</b> 546 Jay Street Colusa, CA 95932 1-530-458-0500 <a href="mailto:ccclerk@countyofcolusa.org">ccclerk@countyofcolusa.org</a></p> <p><b>Arbuckle Public Utility District</b> Jim Scheimer, Manager P.O. Box 207 Arbuckle, CA 95912 530-476-2054 <a href="mailto:apud@frontiernet.net">apud@frontiernet.net</a></p> <p><b>California Public Utilities Commission</b> Daniel Song Division of Water and Audits 415-703-2691 <a href="mailto:water_division@cpuc.ca.gov">water_division@cpuc.ca.gov</a></p>
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**Del Oro Water Company**  
**River Island District**  
**Service List for Advice Letter No. 398**

**California Public Utilities Commission**

Division of Ratepayer Advocates

[dra\\_water\\_al@cpuc.ca.gov](mailto:dra_water_al@cpuc.ca.gov)**Tulare County Administrator**

Jean Rousseau

2800 West Burrel Avenue

Visalia, CA 93291-4582

1-559-636-5005

[DNAtkins@co.tulare.ca.us](mailto:DNAtkins@co.tulare.ca.us)**Del Oro Water Company**

Janice Hanna, Director of Corporate Accounting

[jeh@corporatecenter.us](mailto:jeh@corporatecenter.us)

Stephanie Sprague, Staff Accountant

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Cheryl Carter, Accounts Receivable

[cmc@corporatecenter.us](mailto:cmc@corporatecenter.us)

Del Oro Water Company, Inc.

[servicelist@delorowater.com](mailto:servicelist@delorowater.com)**Springville Public Utility District (SPUD)**

Attn: Marilyn

P.O. Box 434

Springville, CA 93265

1-559-539-2869

[Spud@springvillewireless.com](mailto:Spud@springvillewireless.com)**California Hot Springs Water Service**

P. O. Box 146

California Hot Springs, CA 93207

No Email

**California Public Utilities Commission**

Daniel Song

Division of Water and Audits

415-703-2691

[water\\_division@cpuc.ca.gov](mailto:water_division@cpuc.ca.gov)

**Del Oro Water Company  
Paradise Pines District**

**Service List for Advice Letter No. 380-B**

<p><b>California Public Utilities Commission</b> Division of Ratepayer Advocates <a href="mailto:dra_water_al@cpuc.ca.gov">dra_water_al@cpuc.ca.gov</a></p> <p><b>Paradise Irrigation District</b> Attn: Kevin Phillips P.O. Box 2409 Paradise, CA 95967 1-530-877-4971 <a href="mailto:kphillips@paradiseirrigation.com">kphillips@paradiseirrigation.com</a></p> <p><b>Del Oro Water Company</b> Janice Hanna, Director of Corporate Accounting <a href="mailto:jeh@corporatecenter.us">jeh@corporatecenter.us</a></p> <p>Stephanie Sprague, Staff Accountant <a href="mailto:stephanie@corporatecenter.us">stephanie@corporatecenter.us</a></p> <p>Tara Campbell, Staff Accountant <a href="mailto:tlc@corporatecenter.us">tlc@corporatecenter.us</a></p> <p>Cheryl Carter, Accounts Receivable <a href="mailto:cmc@corporatecenter.us">cmc@corporatecenter.us</a></p> <p><b>Del Oro Water Company, Inc.</b> <a href="mailto:servicelist@delorowater.com">servicelist@delorowater.com</a></p>	<p><b>Butte County, Chief Administration Officer</b> Paul Hahn 25 County Center Drive Oroville, CA 95966 1-530-538-7631 <a href="mailto:phahn@buttecounty.net">phahn@buttecounty.net</a></p> <p><b>Butte County Water and Resource Conservation</b> Ms. Vickie Newlin 308 Nelson Avenue Oroville, CA 95965 1-530-538-4343 <a href="mailto:vnewlin@buttecounty.net">vnewlin@buttecounty.net</a></p>
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**Del Oro Water Company  
Ferndale District**

**Service List for Advice Letter No. 396**

<p><b>California Public Utilities Commission</b> Division of Ratepayer Advocates <a href="mailto:dra_water_al@cpuc.ca.gov">dra_water_al@cpuc.ca.gov</a></p> <p><b>Del Oro Water Company</b> Janice Hanna, Director of Corporate Accounting <a href="mailto:jeh@corporatecenter.us">jeh@corporatecenter.us</a></p> <p>Stephanie Sprague, Staff Accountant <a href="mailto:ses@corporatecenter.us">ses@corporatecenter.us</a></p> <p>Tara Campbell, Staff Accountant <a href="mailto:tlc@corporatecenter.us">tlc@corporatecenter.us</a></p> <p>Cheryl Carter, Accounts Receivable <a href="mailto:cmc@corporatecenter.us">cmc@corporatecenter.us</a></p> <p><b>Del Oro Water Company, Inc.</b> <a href="mailto:servicelist@delorowater.com">servicelist@delorowater.com</a></p>	<p><b>Riverside Community Services District</b> Nancy Trujillo P.O. Box 857 Ferndale, CA 95536 1-707-786-9772 No-email</p> <p><b>Humboldt County Administrator</b> Loretta A. Nickolaus, 825 Fifth Street, Room 111 Eureka, CA 95501-1153 1-707-445-7266 <a href="mailto:cao@co.humboldt.ca.us">cao@co.humboldt.ca.us</a></p> <p><b>Ferndale Enterprise</b> PO Box 1066, Ferndale, CA 95536 <a href="mailto:editor@ferndaleenterprise.us">editor@ferndaleenterprise.us</a></p>
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**Del Oro Water Company  
Lime Saddle District**

**Service List for Advice Letter No. 396**

<p><b>California Public Utilities Commission</b> Division of Ratepayer Advocates <a href="mailto:dra_water_al@cpuc.ca.gov">dra_water_al@cpuc.ca.gov</a></p> <p><b>Paradise Irrigation District</b> Attn: Kevin Phillips P.O. Box 2409 Paradise, CA 95967 1-530-877-4971 <a href="mailto:kphillips@paradiseirrigations.com">kphillips@paradiseirrigations.com</a></p> <p><b>Del Oro Water Company</b> Janice Hanna, Director of Corporate Accounting <a href="mailto:jeh@corporatecenter.us">jeh@corporatecenter.us</a></p> <p>Michelle Rasmussen, Staff Accountant <a href="mailto:mdr@corporatecenter.us">mdr@corporatecenter.us</a></p> <p>Tara Campbell, Staff Accountant <a href="mailto:tlc@corporatecenter.us">tlc@corporatecenter.us</a></p> <p>Cheryl Carter, Accounts Receivable <a href="mailto:cmc@corporatecenter.us">cmc@corporatecenter.us</a></p> <p><b>Del Oro Water Company, Inc.</b> <a href="mailto:servicelist@delorowater.com">servicelist@delorowater.com</a></p>	<p><b>Butte County Water and Resource Conservation</b> Ms. Vickie Newlin 308 Nelson Avenue Oroville, CA 95965 1-530-538-4343 <a href="mailto:vnewlin@buttecounty.net">vnewlin@buttecounty.net</a></p> <p><b>Butte County, Chief Administration Officer</b> Paul Hahn 25 County Center Drive Oroville, CA 95966 1-530-538-7631 <a href="mailto:phahn@buttecounty.net">phahn@buttecounty.net</a></p> <p><b>County of Butte, Board of Supervisors</b> Attn: Robin Bennett 747 Elliott Road Paradise, CA 95969 1-530-872-6304 <a href="mailto:dteeter@buttecounty.net">dteeter@buttecounty.net</a></p>
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**Del Oro Water Company  
Walnut Ranch District**

**Service List for Advice Letter No. 396**

<p><b>California Public Utilities Commission</b> Division of Ratepayer Advocates <a href="mailto:dra_water_al@cpuc.ca.gov">dra_water_al@cpuc.ca.gov</a></p> <p><b>Del Oro Water Company</b> Janice Hanna, Director of Corporate Accounting <a href="mailto:jeh@corporatecenter.us">jeh@corporatecenter.us</a></p> <p>Stephanie Sprague, Staff Accountant <a href="mailto:stephanie@corporatecenter.us">stephanie@corporatecenter.us</a></p> <p>Tara Campbell, Staff Accountant <a href="mailto:tlc@corporatecenter.us">tlc@corporatecenter.us</a></p> <p>Cheryl Carter, Accounts Receivable <a href="mailto:cmc@corporatecenter.us">cmc@corporatecenter.us</a></p> <p><b>Del Oro Water Company, Inc.</b> <a href="mailto:servicelist@delorowater.com">servicelist@delorowater.com</a></p>	<p><b>City of Colusa, Water &amp; Sewer</b> Mr. Frank Garofalo P.O. Box 1063 Colusa, CA 95932 1-530-458-4941 No-email</p> <p><b>Kathleen Moran, Colusa County Clerk</b> 546 Jay Street Colusa, CA 95932 1-530-458-0500 <a href="mailto:ccclerk@countyofcolusa.org">ccclerk@countyofcolusa.org</a></p>
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(END OF ATTACHMENT 4)